

The Parties are therefore now jointly requesting a fourteen (14) day extension of the discovery deadline, with a new deadline of Friday, October 9, 2020.

The requested extension of time will not affect any other timelines in the Scheduling Order, including the deadline for pre-trial motions set for October 26, 2020.

The Parties do not move for this extension for the purpose of delay, but rather in the interests of justice and judicial economy.

Therefore, based on the above, the Parties respectfully move this Court to extend the September 25, 2020 discovery deadline to October 9, 2020.

Respectfully submitted,

/s/ Beth Mitchell
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CERTIFICATE OF CONFERENCE

I hereby certify that on September 23, 2020, I conferred with counsel for Defendant, who stated that Defendant agrees to join this motion.

/s/ Beth Mitchell
BETH MITCHELL

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2020, a true and correct copy of the foregoing document was electronically filed using the Court's CM/ECF filing system, thus providing notice of electronic filing to the following:

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